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Campus, Natasha Trivers, Kimberly Wall, Adam Johnson,
Kathryn Bass, and Joseph Morgan*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GABRIELLE CLARK; and WILLIAM CLARK,

Plaintiffs,

vs.

DEMOCRACY PREP PUBLIC SCHOOLS, Inc.;
and DEMOCRACY PREP NEVADA LLC; and
DEMOCRACY PREP AGASSI CAMPUS; and
NATASHA TRIVERS, in her capacity as CEO of
Democracy Prep Public Schools, Inc.; and
KIMBERLY WALL, in her capacity as assistant
superintendent of Democracy Prep Public
Schools, Inc.; and ADAM JOHNSON, in his
capacity as executive director of Democracy Prep
Agassi Campus; and KATHRYN BASS, in her
capacity as a teacher at Democracy Prep Agassi
Campus; and JOSEPH MORGAN, in his capacity
as president of Democracy Prep Agassi Campus;
and REBECCA FEINEN, in her capacity as the
Executive Director of the State Public Charter
School Authority; and MELISSA MACKEDON
(chair), RANDY KIRNER (vice chair), SHELIA
MOULTON, SAMI RANDOLPH, MALLORY
CYR, TONIA HOLMES-SUTTON, DON
SOIFER, TAMIKA SHAUNTEE ROSALES,
LEE FARRIS, in their capacities as members of
the State Public Charter School Authority,

Defendants.

CASE NO.: 2:20-cv-02324-APG-VCF

**DEMOCRACY PREP DEFENDANTS'
MOTION TO EXCEED PAGE LIMITS FOR
THEIR REPLY BRIEF**

Democracy Prep Public Schools, Inc., Democracy Prep Nevada LLC, Democracy Prep Agassi Campus, Natasha Trivers, Kimberly Wall, Adam Johnson, Kathryn Bass, and Joseph Morgan (“Defendants”) by and through their attorneys of record, the law firm of GREENBERG TRAURIG, LLP, hereby move to exceed the 12-page limit set by Local Rule 7-3(b) by 3 additional pages (for a total of fifteen (15) pages) for reply brief for the Motion to Dismiss, which is due on July 30, 2021.

Good cause exists to exceed the page limits because Defendants cannot adequately or fully respond to Plaintiffs’ 12 separate causes of action in Plaintiffs’ First Amended Complaint and the 28-page opposition brief without exceeding the page limits set forth in Local Rule 7-3(b). In addition, there is good cause because the Court has enlarged the page limit for the opening and response briefs. Moreover, the reply will be submitted on behalf of eight different Defendants: three corporate defendants and five individual defendants, and there are distinct arguments for each group. Finally, good cause is present because this matter involves complex issues involving constitutional law and government immunities. Plaintiffs consent to this request.

Accordingly, for the foregoing reasons, it is respectfully requested that Defendants’ motion be granted and they be permitted to file a reply brief not to exceed 15 pages.

DATED this 16th day of July, 2021.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

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IT IS SO ORDERED:

Dated: July 16, 2021

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ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE